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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Mr. William F. Caton, Acting Secretary  
Federal Communications Commission  
1919 M Street, NW. Room 222  
Washington, DC 20554

Re: Ex Parte - CC Docket No. 96-149

Dear Mr. Caton:

Pursuant to a request by Radhika Karmarkar of the Common Carrier Bureau's Policy and Planning Division, AT&T is providing additional information regarding the issues and concerns raised in its Comments in Docket 96-149. AT&T's objective is to focus the Commission's efforts on implementing the types of the non-accounting safeguards and reporting requirements that can mitigate potential abuses by the BOCs of any residual market power they continue to possess if and when they are permitted to provide in-region interLATA services. AT&T's inputs, submitted in questions and answer format, are provided in the attachment to this letter.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(1) of the Commission's rules.

Sincerely,

A handwritten signature in cursive script that reads "Charles E. Griffin".

Charles E. Griffin  
Government Affairs Director

cc: Mr. Jason Karp  
Ms. Melinda Littell  
Ms. Susan McMaster  
Ms. Jeannie Su  
Ms. Carol Matthey

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- Reporting requirements can never fully detect nor completely deter discrimination in the provision and maintenance of access services. For example:
  - Significant matters cannot be captured by reporting requirements (e.g., cooperation in new access service development; good faith provision of progress reports on trouble resolution; etc.).
  - Reports remain subject to the risks of undetectable discrimination inherent in reporting large amounts of data in aggregate, and often based on averages.
  - The determination of when the reporting interval begins (e.g., when was an access service request or trouble report received in “acceptable” form) remains largely in the discretion of the LEC.
- Nonetheless, reporting requirements can assist in the detection and deterrence of at least some types of anticompetitive discrimination.
- Such requirements, moreover, need not impose substantial burdens on the LECs.

- AT&T and the LECs currently use a number of measures to assess the quality of access services provided to AT&T.
- Reporting requirements based on the most significant of these existing quality measures would focus on those aspects of access provisioning and maintenance that carriers themselves consider important.
- In addition, because these measures are already used by access suppliers and interexchange carriers, use of these measures would not impose a substantial, new burden on the LECs.

AT&T currently expects its access providers to report to AT&T access performance results on a monthly basis. In general, AT&T assesses the access provider's provisioning and maintenance performance for each access service on the basis of, among other things, a series of measures, a subset of which follows:

1. Timely Installation of Access

Direct measure(s)  
of quality (DMOQ): - Customer desired due date  
(CDDD)

2. Timely Confirmation of Access Orders

DMOQ: - Interval to Firm Order  
Confirmation (FOC)

3. Timely Notification of Potential Delay in  
Provisioning

DMOQ: - Provision of Jeopardy  
Notification

4. Timely Implementation of PIC Selections

DMOQ: - Interval to implementation  
of PIC change

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## 5. Failure of New Access Installations

DMOQ: - Number of New Circuit Failures

## 6. Access service outages

DMOQ: - Failure Frequency (FF)

## 7. Access service restoration

DMOQ: - Time To Restore (TTR)  
- Mean Time To Clear Network (MTCN)

## 8. Repeat of service outages

DMOQ: - Network Repeat Failures (NRF)

Reporting requirements should be developed based on these same measures. For example:

DMOQ	Types of Access
Customer Desired Due Date On-Time Performance (%)	DS3 and Above
	DS1
	DS0 Voice Grade
	DS0 Digital
Time from Customer Desired Due Date to Circuit Being Placed In Service (% installed within each successive 24 hour period, until 95% installation)	DS3 and Above
	DS1
	DS0 Voice Grade
	DS0 Digital
Time to Firm Order Confirmation (% received within each successive 24 hour period, until 95% received)	DS3 and Above
	DS1
	DS0 Voice Grade
	DS0 Digital
Jeopardy Notification Provided (% of delayed installations)	DS3 and Above
	DS1
	DS0 Voice Grade
	DS0 Digital
Time from PIC Change Request to Implementation (% implemented within each successive 6 hour period, until 95% implementation)	By CIC (10XXX) code
Incidence of New Circuit Failures (% failed within 30 days of installation)	DS3 and Above
	DS1
	DS0 Voice Grade
	DS0 Digital
Failure Frequency (% of circuits purchased by IXC from AP that have experienced a trouble occurrence)	DS3 and Above
	DS1 Channelized
	DS1 Non-Channelized
	DS0 Voice Grade
	DS0 Digital
TTR (Time to Restore / trouble duration) (% restored within each successive 1 hour interval, until resolution of 95% of incidents)	DS1 Non-Channelized
	DS0 Voice Grade
	DS0 Digital
	POTS
TTR PIC (time to restore PIC after trouble incident) (% restored within each successive 6 hour period, until 95% restored)	By CIC (10XXX) code
MTCN (Mean Time to Clear Network / average duration of trouble) (Hours)	DS1 Non-Channelized
	DS0 Voice Grade
	DS0 Digital
NRF (Network Repeat Failure within 30 days of initial trouble) (%)	DS1 Non-Channelized
	DS0 Voice Grade
	DS0 Digital

- The LEC should provide public monthly reports to the FCC based on these measures for the specified access services for (i) its affiliated operations, and (ii) all other interexchange carriers in aggregate.
- The LEC should also provide individual interexchange carrier reports to the FCC on a confidential basis. That information should also be available to the subject interexchange carrier, which could then challenge reported information, and identify troubling patterns (e.g., LEC routinely indicates receipt of access service requests and/or trouble reports some time after IXC views itself as first issuing request or report)
- The LEC should also be required to provide the FCC the detailed data and analysis that support these reports whenever the accuracy of the reports, or conduct subject to the reports, is challenged.